

# **EXHIBIT P**

**Makitalo, Rebecca I.**

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**From:** Arjun Vasan <arjun.vasan@gmail.com>  
**Sent:** Wednesday, October 22, 2025 12:41 AM  
**To:** Keech, Ryan Q.; Chiu, Stacey G.; Makitalo, Rebecca I.; Winningham, Jacob R.  
**Subject:** Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx - Rule 11 Safe Harbor Notice  
**Attachments:** Notice and Motion for Sanctions.pdf; Exhibit E - Nessler Declaration.pdf; Exhibit A - Warns Declaration, IPAA, IPAL.pdf; Exhibit C - Agarwal Decl., Bonus Agreement, Offer Letter, Lunchbox Emails.pdf; Exhibit B - Jan 29 Notice, Feb 7 Response (FINAL).pdf; Exhibit D - Settlement Outreach, Notices of Claim, Document Requests.pdf; Exhibit F - Allegation to Source Map Flat.pdf; Exhibit G - Ethics Complaint and Charles Tea Formal Response (FINAL) copy.pdf; Exhibit K - Zoom Transcript copy.pdf

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Counsel,

Pursuant to Fed. R. Civ. P. 11(c)(2), I am serving (not filing) the attached Plaintiff's Motion for Sanctions (with exhibits) directed to counterclaim contentions that (i) misuse settlement communications to prove liability/amount (FRE 408, 11(b)(2)), (ii) mischaracterize the Feb. 7 Holder-Rep response letter and miscast it as my personal "admission" (FRE 801(d)(2) failure), (iii) misquote/withhold contractual language in violation of Rule 11(b)(3)'s reasonable-inquiry requirement; (iv) crossed the *Flatley* line with extortionate demand letters leveraged to procure "admissions" (Rule 11(b)(1), Penal Code §§ 518–519).

If, by 5:00PM, Wednesday, November 12, 2025, Checkmate withdraws its counterclaims or amends to remove the allegations in Exhibit F, I will not file the motion.

Best regards,

Arjun Vasan

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